

John Rue (047032005)  
**John Rue & Associates, LLC**  
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(862) 283-3155

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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M.A.,	)	
	)	Civil Action No. 3:20-cv-05218
<i>Plaintiff,</i>	)	
	)	
v.	)	
	)	<b>CERTIFICATION OF</b>
Wall Township Board of Education,	)	<b>JOHN RUE</b>
	)	
<i>Defendant.</i>	)	
	)	

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I, John Douglas Rue, Esq., of full age, hereby certify as follows:

1. I am an attorney at law in the State of New Jersey and I am the Principal of John rue & Associates, LLC (“JR&A”), which represents plaintiff M.A. (“Plaintiff”) in this matter. As such, I am personally familiar with the facts contained herein.

2. I make this Certification, based on my personal knowledge and review of my firm’s records, in support of Plaintiff’s application for an award of attorney’s fees and expenses in the above-captioned action.

3. I received my BA (Hons.), from Nottingham Trent University in 1990 and an MFA from Sarah Lawrence College in 1993.

4. I received my J.D., *magna cum laude*, from Fordham Law School in 2004, where I was a Notes and Articles Editor of the Fordham Law Review, and published a student Note. *See* John D. Rue, Returning to the Roots of the Bramble Bush: The "But For" Test Regains Primacy in Casual Analysis in the American Law Institute's Proposed Restatement (Third) of Torts, 71 Fordham L. Rev. 2679 (2003), available at <https://ir.lawnet.fordham.edu/flr/vol71/iss6/8>.

5. I am admitted to practice before the courts of the State of New Jersey, the State of New York, the United State District Court for the District of New Jersey, the Southern District of New York and the Eastern District of New York, the United State Court of Appeals for the Second and Third Circuits, and the United States Supreme Court.

6. I began my legal career at White and Case LLP as an Associate in that firm's Litigation practice group. While there, I was able to do a great deal of special education *pro bono* litigation, primarily in New Jersey. In 2014, I began my own practice, focusing on special education and civil rights litigation in New Jersey. When I left White & Case in 2012, my undiscounted billing rate for commercial clients was \$690.00 per hour.

7. I now spend most of my professional time representing parents of children with disabilities and the Innisfree Foundation (as its outside counsel) in disputes with public schools.

8. As Principal of JR&A, I am responsible for setting the billing rates for me and the attorneys, law clerks, and paralegals that work for and with me. I have set the billing rates for attorneys and support staff at JR&A based on education, training and experience as follows:

- John Rue (Principal): \$495 per hour (admitted 2005)
- Donald Soutar (Partner): \$485 per hour (admitted 1999)
- Robert Thurston (Of Counsel): \$485 per hour (admitted 1988)
- Lisa Quartarolo (Counsel): \$385 per hour (admitted 1998)
- Frank Geier (Associate): \$385 per hour (admitted 2005)
- Kenneth Walk (Associate): \$275 per hour (admitted 2019)
- Latiah Griffin (Law Clerk): \$220 per hour per hour
- Paralegal work (by whomever performed): \$165 per hour

9. I was predominantly assisted on this matter by Donald A. Soutar, who was formerly the Managing Partner of JR&A.

- a. Mr. Soutar has practiced in the area complex commercial litigation for 19 years, and since April 2018, has focused on education law, representing parents.
- b. From 1999 through 2011, Mr. Soutar was associated with Day Pitney LLP, first as an Associate and rising to Senior Counsel, where his practice focused on commercial litigation.
- c. From 2011, he was an Associate at Weitz & Luxenberg, PC, where his practice focused on mass tort and class action matters. Mr. Soutar joined JR&A as Counsel in April 2018 and was promoted to

Partner at the end of 2018, and to Managing Partner shortly thereafter.

- d. Since joining John Rue & Associates, Mr. Soutar has focused predominantly on education and special education matters, including handling cases from inception through hearing in the Office of Administrative Law (“OAL”), and litigating in the federal and state courts of New Jersey.
- e. In the attached *pro forma* Invoice, JR&A’s billing rate for Counsel, Mr. Soutar’s position at the start of this case, is \$440 per hour. His hourly rate as a partner, beginning January 1, 2019, increased to \$485. (Mr. Soutar worked a total of 175.7 hours on this matter. He worked 38.5 hours at \$440 per hour and 137.2 hours at \$485 per hour.)
- f. Mr. Soutar retired from JR&A in December 2021.

10. I was also assisted by:

- a. Lisa Quartarolo, Esq., who was admitted to the bar in 1998 and has extensive experience representing parents of students with disabilities;

- b. Kenneth Walk, Esq., who was admitted to the bar in 2019 and joined JR&A to fuse his experience as a public-school administrator with his legal career;
- c. Frank Geier, who was admitted to the bar in 2005, and works part-time for JR&A;
- d. Latiah Griffin, who was a “law clerk” at the time that she worked on this matter. Ms. Griffin was admitted to the New Jersey bar in September 2020; and
- e. Sean Dalrymple, Paralegal.

11. Following Mr. Soutar’s retirement from JR&A, Robert Thurston, Esq., who is Of Counsel to JR&A, assumed primary responsibility for this matter. Mr. Thurston has been an attorney for more than thirty years, has run his own firm since 2005, and has extensive experience representing parents and students with disabilities.

12. Plaintiff, originally through her mother because she had not reached the age of majority, retained JR&A on February 22, 2017.

13. Over the nearly five years that it has represented the Plaintiff, JR&A has performed a large variety of services for Plaintiff. For example, from February 2017 through May 2018, JR&A provided legal advice and engaged in advocacy efforts of behalf of Plaintiff, but those efforts did not involve litigation. During that

period, Plaintiff incurred attorneys' fees in the amount \$25,641.20. Inasmuch as those advocacy efforts did not involve litigation before the OAL or this Court, Plaintiff is not seeking to recover those costs.

14. JR&A performed other related services on behalf of Plaintiff that were the subject of a separate engagement agreement. Plaintiff is not seeking to recover those costs, either.

15. Rather, Plaintiff is seeking only those costs that began to accrue on June 12, 2018 related to Plaintiff's *Parental Request for Mediation*, which is the genesis of this matter.

16. Attached hereto as Exhibit A is a true copy of a *pro forma* invoice created from the billing records for this matter.

17. In total, JR&A attorneys and staff spent a total of 376.85 hours and Plaintiff incurred attorneys' fees of \$153,222.25, for a blended hourly rate of \$406.59, as follows:

Phase	Activity	Hours	Fees	Blended Hourly Rate
I	Preparation of the Mediation Request through the District' filing of its Motion to Dismiss (Jun. 2018 – Mid-Dec 2018)	103.10	\$36,971.00	\$358.59
II	District's Motion to Dismiss through Dismissal Order (Mid-Dec. 2018 – Jan. 31, 2019)	103.80	\$48,183.00	\$464.19
III	Appeal to the District of New Jersey	154.45	\$63,465.25	\$410.91

	(Feb. 2019 – Nov. 29, 2021)			
IV	Post-Judgment/Fee Application (Nov. 30, 2021 – Feb. 9, 2022)	34.00	\$16,191.00	\$476.21
	TOTALS	395.35	\$164,810.25	\$416.87

18. In addition, Plaintiff incurred expenses in the amount of \$412.00, consisting of this Court's filing fee and postage.

19. In total, Plaintiff incurred attorneys' fees and expenses in the amount of \$165,222.25.

I certify that the foregoing statements are true. I am aware that if any of the foregoing statements are willfully false I am subject to punishment.

Dated: February 10, 2022

s/ John D. Rue  
John D. Rue

# Exhibit A



**John Rue & Associates, LLC**

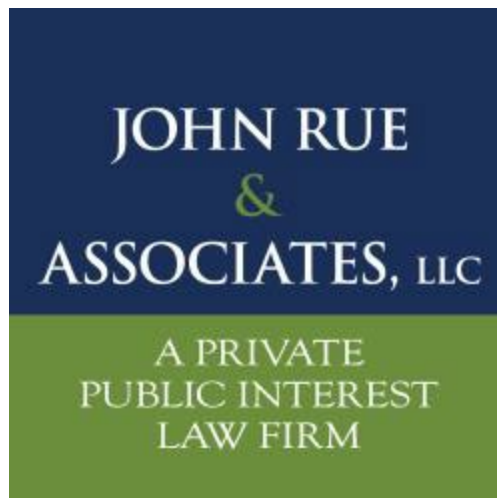
40 S Fullerton Ave, Ste 29  
 Montclair, NJ 07042  
 862-283-3155

**Bill To:**

D <sup>REDACTED</sup> REDACTED

REDACTED

Spring Lake Heights, New Jersey 07762

**INVOICE**

Invoice #	<b>1357</b>
Invoice Date	Feb 10, 2022
Matter #	C00190
Due	Due Upon Receipt
Case/Matter	Augustyn Flat Fee

Date	Staff	Description	Rate	Hours	Amount
*****		<b>Fees (June 2018-January 2022)</b>	*****		
Jun 12, 2018	DS	Review client email; attend to strategy concerning same; review draft mediation request; phone call with client (D. Augustyn) re: Mediation Request; review Mediation Request per client comments; draft email to client with comment and instructions regarding Mediation Request	\$440.00	1.7	\$748.00
Jun 13, 2018	JR	Attention to mediation request.	\$495.00	2.5	\$1,237.50
Jun 13, 2018	DS	Phone call with client; revise draft Mediation Request; draft email to client sending same to client; work with client to obtain fax copy of signed mediation Request; clean up and file same; finalize Rue letter to adversary counsel re: service of Mediation Request	\$440.00	2.3	\$1,012.00

Jun 22, 2018	DS	Review mediation scheduling email; attend to same	\$440.00	0.3	\$132.00
Jun 24, 2018	JR	Email communications re mediation confirmation.	\$495.00	0.2	\$99.00
Jun 25, 2018	LA	Attention to email correspondence re in-office meeting and upcoming mediation	\$220.00	0.5	\$110.00
Jun 25, 2018	JR	Attention to scheduling; client communications re same; attention to confirmation of mediation request; attention to DOE communication re same.	\$495.00	0.5	\$247.50
Jun 25, 2018	DS	Review file re: acknowledgment of mediation and scheduling; draft email to client re: same	\$440.00	0.3	\$132.00
Jun 26, 2018	DS	Exchange emails with Mediation scheduler and adversary counsel; draft "Parent Authorization" letter	\$440.00	0.6	\$264.00
Jun 29, 2018	DS	Review scheduling emails; draft email to client re: same and to set up a meeting; review revised Mediation Notice and forward same to client	\$440.00	0.3	\$132.00
Jul 05, 2018	DS	Review Voicemail from client; draft email response to same; attend to same	\$440.00	0.4	\$176.00
Jul 10, 2018	LA	Attention to in-office meeting with client	\$220.00	4.5	\$990.00
Jul 10, 2018	DS	Client Meeting to prepare for Mediation	\$440.00	4.3	\$1,892.00
Jul 31, 2018	DS	Prepare for Mediation	\$440.00	1	\$440.00
Aug 01, 2018	DS	Prepare for Mediation, including preparation of grade-change proposal and issue list; phone call with client	\$440.00	5.3	\$2,332.00
Aug 01, 2018	LA	Attention to discussion and review of meeting notes and transcript with DS in preparation for mediation	\$220.00	2	\$440.00
Aug 01, 2018	JR	Preparation for mediation	\$495.00	2.2	\$1,089.00
Aug 02, 2018	DS	Attend Mediation and related travel	\$440.00	4.8	\$2,112.00
Aug 02, 2018	DS	Draft email to client	\$440.00	0.9	\$396.00
Aug 02, 2018	JR	Mediation at Wall Township BOE; travel	\$495.00	5	\$2,475.00

Sep 12, 2018	DS	Review hearing notice; email to adversary; draft adjournment request	\$440.00	0.3	\$132.00
Sep 12, 2018	DS	Finalize/fax letter; follow-up call to client re: adjournment	\$440.00	0.3	\$132.00
Sep 13, 2018	DS	Phone calls to OAL to confirm adjournment; email to adversary	\$440.00	0.1	\$44.00
Sep 18, 2018	DS	Email to client; email to adversary	\$440.00	0.5	\$220.00
Sep 24, 2018	DS	Review client voicemail and notes re: same; leave detailed voicemail to client; prepare for Settlement Conference	\$440.00	1.4	\$616.00
Sep 25, 2018	DS	Attend to strategy for Settlement Conference; prepare for same; phone call from client; complete notes for client review; draft email to client	\$440.00	3.4	\$1,496.00
Sep 26, 2018	DS	Phone call from client	\$440.00	0.3	\$132.00
Sep 27, 2018	DS	Phone call with client; prepare for conference; attend OAL Settlement Conference in Trenton, NJ (also attend scheduling conference with trial judge); related travel; confer internally re: same	\$440.00	6.4	\$2,816.00
Sep 27, 2018	DS	Preliminary research on judge; draft email to client re: schedule, etc.	\$440.00	0.4	\$176.00
Nov 29, 2018	LQ	TC with DAS to discuss case	\$440.00	0.2	\$88.00
Nov 29, 2018	LQ	RESEARCH SOL exemptions and revision of student records	\$440.00	2	\$880.00
Nov 29, 2018	LQ	Review documents from file	\$440.00	0.4	\$176.00
Nov 29, 2018	LQ	DRAFT Memo to file re: SOL	\$440.00	1.3	\$572.00
Dec 03, 2018	DS	Review file and personal notes and provide copy of most recent H.S. Transcript to L. Quartarolo	\$440.00	0.4	\$176.00
Dec 03, 2018	DS	Respond to request from L. Quartarolo re: Due Process Petition	\$440.00	0.3	\$132.00
Dec 03, 2018	LQ	Research statute of limitations	\$440.00	0.75	\$330.00
Dec 03, 2018	LQ	File review - to determine issues and comparison of facts with district policies	\$440.00	1.5	\$660.00

Dec 04, 2018	LQ	DRAFT Memo to file with updated information	\$440.00	1.5	\$660.00
Dec 05, 2018	LQ	Meeting with DAS - response to brief expected 12/14	\$440.00	0.35	\$154.00
Dec 05, 2018	LQ	File Review	\$440.00	0.3	\$132.00
Dec 06, 2018	LQ	Review Audio of IEP meeting and take notes	\$440.00	1.3	\$572.00
Dec 06, 2018	LQ	File review for documents	\$440.00	0.5	\$220.00
Dec 07, 2018	DS	Analyze case file and calendar; draft detailed email to client re: upcoming motion	\$440.00	1.1	\$484.00
Dec 07, 2018	SD	Pulling REDACTED files for Don.	\$165.00	1.3	\$214.50
Dec 07, 2018	SD	Call w Don/Lisa re: IEPs.	\$165.00	0.8	\$132.00
Dec 07, 2018	SD	Locating/Sorting IEPs for scanning.	\$165.00	0.7	\$115.50
Dec 07, 2018	SD	IEP Document review.	\$165.00	0.4	\$66.00
Dec 07, 2018	SD	SharePoint document review	\$165.00	1	\$165.00
Dec 07, 2018	SD	Scanning IEP Docs.	\$165.00	1.4	\$231.00
Dec 07, 2018	SD	IEP Document review.	\$165.00	1.1	\$181.50
Dec 07, 2018	SD	Uploading IEP docs, e-mail to Don/Lisa re: next steps.	\$165.00	0.5	\$82.50
Dec 07, 2018	LQ	TC with DAS and Sean re: documents needed from files and from client	\$440.00	0.6	\$264.00
Dec 07, 2018	LQ	File Review for documents	\$440.00	0.75	\$330.00
Dec 07, 2018	SD	Scanning Correspondence files.	\$165.00	0.5	\$82.50
Dec 10, 2018	SD	Correspondence Docs Review.	\$165.00	0.3	\$49.50
Dec 10, 2018	LQ	Review of information in IEPs from 2013-2017 and notes of recommendations made in IEPs	\$440.00	1.75	\$770.00
Dec 10, 2018	LQ	TC with DAS	\$440.00	0.2	\$88.00
Dec 10, 2018	LQ	DRAFT chart of recommendations from IEPs	\$440.00	0.5	\$220.00
Dec 10, 2018	SD	Scanning Augustyn Correspondence Docs.	\$165.00	0.2	\$33.00
Dec 10, 2018	SD	Scanning Correspondence Docs.	\$165.00	0.5	\$82.50

Dec 10, 2018	SD	Scanning Correspondence Docs.	\$165.00	0.4	\$66.00
Dec 10, 2018	SD	Scanning Correspondence Docs.	\$165.00	1	\$165.00
Dec 10, 2018	SD	Scanning Correspondence Docs.	\$165.00	0.4	\$66.00
Dec 11, 2018	SD	Sending Lisa e-mail re: REDACTED files, uploading correspondence docs.	\$165.00	0.1	\$16.50
Dec 11, 2018	SD	Scanning E-mail Docs.	\$165.00	0.7	\$115.50
Dec 11, 2018	SD	Formatting Correspondence scans.	\$165.00	0.7	\$115.50
Dec 11, 2018	LQ	File Review	\$440.00	1	\$440.00
Dec 11, 2018	SD	Correspondence scans Review.	\$165.00	0.2	\$33.00
Dec 11, 2018	SD	Correspondence scans review.	\$165.00	0.4	\$66.00
Dec 11, 2018	SD	Searching for Documents requested by Lisa.	\$165.00	1	\$165.00
Dec 12, 2018	DS	Confer with L. Quartarolo re: documents and strategy	\$440.00	0.3	\$132.00
Dec 12, 2018	SD	Scanning Evaluations Docs.	\$165.00	0.6	\$99.00
Dec 12, 2018	SD	Augustyn Evaluation Docs Review, e-mail to Lisa re: document location.	\$165.00	0.9	\$148.50
Dec 12, 2018	LQ	Consult with DAS	\$440.00	0.3	\$132.00
Dec 12, 2018	LQ	Review relevant docs with paralegal for adding to file	\$440.00	0.2	\$88.00
Dec 12, 2018	LQ	Review files (hard copy) received from District and mark relevant documents to be scanned	\$440.00	2	\$880.00
Dec 12, 2018	SD	Scanning Lisa's requested Docs, Review.	\$165.00	1.2	\$198.00
Dec 12, 2018	SD	Review/Formatting Lisa's requested Docs.	\$165.00	0.4	\$66.00
Dec 12, 2018	SD	Uploading Lisa's requested docs.	\$165.00	0.1	\$16.50
Dec 13, 2018	DS	Phone calls to/from D REDACTED A REDACTED re: defense of anticipated dispositive motion	\$440.00	0.4	\$176.00
Dec 13, 2018	LQ	Review hardcopy files from previous attorney	\$440.00	2	\$880.00
Dec 13, 2018	LQ	Create timeline of key events from 2015-2017	\$440.00	0.5	\$220.00

Dec 13, 2018	<i>LQ</i>	Update grid and background information in preparation for response to motion and due process petition	\$440.00	0.5	\$220.00
Dec 13, 2018	<i>SD</i>	Scanning School work/faculty correspondence Docs.	\$165.00	1.4	\$231.00
Dec 13, 2018	<i>SD</i>	Faculty correspondence/school work review/uploading.	\$165.00	0.5	\$82.50
Dec 14, 2018	<i>DS</i>	Review calendar and draft email to adversary re: service of MSD	\$440.00	0.3	\$132.00
Dec 14, 2018	<i>SD</i>	Scanning Legal Correspondence Docs.	\$165.00	1.9	\$313.50
Dec 14, 2018	<i>SD</i>	Legal Correspondence Review/Uploading.	\$165.00	0.8	\$132.00
Dec 14, 2018	<i>SD</i>	Scanning Progress Reports Docs.	\$165.00	1.3	\$214.50
Dec 14, 2018	<i>SD</i>	Progress Report Docs. Review/Uploading.	\$165.00	0.5	\$82.50
Dec 14, 2018	<i>SD</i>	Scanning Trial Docs.	\$165.00	1.2	\$198.00
Dec 14, 2018	<i>SD</i>	Scanning Trial Docs.	\$165.00	0.7	\$115.50
Dec 14, 2018	<i>SD</i>	Trial Docs. Review	\$165.00	0.5	\$82.50
Dec 14, 2018	<i>SD</i>	Trial Docs Review	\$165.00	0.5	\$82.50
Dec 17, 2018	<i>DS</i>	Attention to emails from adversary	\$440.00	0.2	\$88.00
Dec 17, 2018	<i>SD</i>	Augustyn Trail Docs Review.	\$165.00	0.9	\$148.50
Dec 17, 2018	<i>LQ</i>	Review District Motion for Partial SJ and cited case law	\$440.00	0.5	\$220.00
Dec 17, 2018	<i>LQ</i>	Review remainder of documents scanned from student files	\$440.00	1	\$440.00
Dec 17, 2018	<i>SD</i>	A <sup>REDACTED</sup> Trial Docs Review/Uploading.	\$165.00	0.9	\$148.50
Dec 18, 2018	<i>DS</i>	Attend to strategy for addressing District's MSD	\$440.00	0.2	\$88.00
Dec 18, 2018	<i>LQ</i>	Organize documents re: HI, grades, Dr. notes and identify missing documents	\$440.00	2	\$880.00
Dec 18, 2018	<i>LQ</i>	Status TC with JDR and DAS	\$440.00	0.2	\$88.00
Dec 20, 2018	<i>LQ</i>	Complete Review of File and flag documents/question for DAS discussion with client	\$440.00	2	\$880.00

Jan 02, 2019	DS	Review/respond to internal email re: facts; review/revise draft email to client; send email to client, including copy of motion papers	\$485.00	0.8	\$388.00
Jan 02, 2019	LQ	Review legal correspondence and highlight facts for amended DP	\$440.00	1	\$440.00
Jan 03, 2019	DS	Review L. Quartarolo email re: SOL; respond to same	\$485.00	0.1	\$48.50
Jan 03, 2019	LQ	Research and draft Response to Motion to Dismiss - section on SOL	\$440.00	2.5	\$1,100.00
Jan 04, 2019	DS	Phone call from C. L. [REDACTED]; draft email to adversary re: Proof of Attendance [total time divided between two matters]	\$485.00	0.3	\$145.50
Jan 04, 2019	LQ	Draft Response to Motion to Dismiss and amended DP - align with mediation request	\$440.00	3	\$1,320.00
Jan 04, 2019	LQ	internal consultation with SD re: documents	\$440.00	0.25	\$110.00
Jan 07, 2019	LQ	Research - KOSHK cases	\$440.00	0.5	\$220.00
Jan 07, 2019	LQ	File management - scan and file legal correspondence	\$440.00	0.5	\$220.00
Jan 07, 2019	LQ	DRAFT Response to Motion to Dismiss	\$440.00	2.5	\$1,100.00
Jan 08, 2019	LQ	Research - establishing KOSHK date	\$440.00	0.7	\$308.00
Jan 08, 2019	LQ	File review and draft amended DP petition - failure to implement	\$440.00	3	\$1,320.00
Jan 09, 2019	LQ	Research scope of appropriate remedy under IDEA	\$440.00	0.5	\$220.00
Jan 09, 2019	LQ	Draft Amended DP petition - Requested Relief	\$440.00	1	\$440.00
Jan 10, 2019	LQ	DRAFT due Process Petition and note areas for client input	\$440.00	2	\$880.00
Jan 10, 2019	LQ	Correspondence to client to request documents needed for amended DP	\$440.00	0.25	\$110.00
Jan 10, 2019	JR	Internal discussions; call with Mr. L. [REDACTED].	\$495.00	1.5	\$742.50
Jan 14, 2019	LQ	Complete amended DP petition and response brief	\$440.00	1.5	\$660.00
Jan 18, 2019	DS	Review draft opposition to motion and draft due process petition; begin to revise same	\$485.00	3	\$1,455.00

Jan 23, 2019	DS	Review/revise draft due process petition; work with L. Quartarolo re: same; draft email to client forwarding draft amended due process petition	\$485.00	1.9	\$921.50
Jan 23, 2019	DS	Complete revisions to Due Process Petition; work with L. Quartarolo to finalize same; draft email to client sending same	\$485.00	3.9	\$1,891.50
Jan 23, 2019	DS	Work on brief in opposition to Motion to Dismiss and in support of Cross-Motion to Amend	\$485.00	0.6	\$291.00
Jan 23, 2019	LQ	Revise amended DP petition (without client input due to lack of response)	\$440.00	1	\$440.00
Jan 24, 2019	DS	Draft Statement of Facts for brief in opposition to motion to dismiss	\$485.00	1.7	\$824.50
Jan 25, 2019	DS	Review/respond to client email	\$485.00	0.3	\$145.50
Jan 25, 2019	DS	Review revisions to brief, and further attention to same	\$485.00	1.7	\$824.50
Jan 25, 2019	LQ	TC and email with SGreenwald re: 2015 documents	\$440.00	0.2	\$88.00
Jan 25, 2019	LQ	Research expert witness disqualification	\$440.00	2.5	\$1,100.00
Jan 26, 2019	DS	Work on Petition and Brief throughout day; emails with client	\$485.00	6	\$2,910.00
Jan 27, 2019	DS	Telephone conference with client (D. A <sup>REDACTED</sup> ) re: revisions to due process petition	\$485.00	1.8	\$873.00
Jan 27, 2019	DS	Telephone conference with client (D. A <sup>REDACTED</sup> ) re: revisions to due process petition	\$485.00	3.8	\$1,843.00
Jan 28, 2019	DS	Finalize motion papers and upload for client delivery to Court; Email re: same	\$485.00	4.3	\$2,085.50
Jan 28, 2019	DS	Phone calls with client re: printing and delivery of motion papers	\$485.00	0.4	\$194.00
Jan 28, 2019	DS	Email to adversary re: electronic delivery of motion papers		0	No Charge
Jan 28, 2019	LQ	Review client revisions and finalize due process petition	\$440.00	0.7	\$308.00
Feb 04, 2019	DS	Briefly review adversary's Reply Brief; draft email to client re: same	\$485.00	0.4	\$194.00



Feb 04, 2019	LA	Attention to call from court re brief; discussion with DS re same	\$220.00	0.2	\$44.00
Feb 04, 2019	JR	Attention to motion to amend briefing.	\$495.00	0.5	\$247.50
Feb 05, 2019	LA	Attention to preparing documents for submission to OAL via USPS; phone call with DS as to same; FileShare and SharePoint issues (resolved)	\$220.00	0.5	\$110.00
Feb 05, 2019	LQ	Review District response (.3) and internal discussion of next steps	\$440.00	0.5	\$220.00
Feb 05, 2019	SD	Preparing A REDACTED Documents for Shipment.	\$165.00	0.2	\$33.00
Feb 05, 2019	JR	Further attention to motion to amend; strategy; client communications.	\$495.00	1.5	\$742.50
Feb 12, 2019	DS	Emails and investigation as to whether Court Conference will go forward in light of storm	\$485.00	0.3	\$145.50
Feb 14, 2019	DS	Prepare status memo for client, including analysis of District's reply brief	\$485.00	1.2	\$582.00
Feb 25, 2019	DS	Review motion papers in preparation for call with Court	\$485.00	1.4	\$679.00
Feb 25, 2019	DS	Final preparation for call with Court; participate in call with Court	\$485.00	0.8	\$388.00
Feb 25, 2019	DS	Review recording of Status Call	\$485.00	0.1	\$48.50
Feb 25, 2019	DS	Attend to follow-up of status call	\$485.00	0.2	\$97.00
Feb 25, 2019	DS	Prepare call summary and email to client	\$485.00	1.5	\$727.50
Feb 25, 2019	DS	Phone call from J. L. REDACTED to discuss email issue	\$485.00	0.2	\$97.00
Feb 26, 2019	LQ	Strategy for settlement discussions	\$440.00	0.2	\$88.00
Mar 15, 2019	DS	Detailed analysis of Transcript and attention to settlement proposals	\$485.00	2.4	\$1,164.00
Mar 18, 2019	LQ	Attention to GPA calculations and accuracy of transcript	\$440.00	0.5	\$220.00
Mar 20, 2019	LQ	Continued attention to GPA calculation and transcript	\$440.00	0.5	\$220.00
Apr 25, 2019	DS	Review Opinion on Motion for Summary Decision	\$485.00	0.5	\$242.50

Apr 25, 2019	DS	Confer internally re; MSD Opinion and strategy for handling matter going forward	\$485.00	0.4	\$194.00
Apr 25, 2019	JR	Correspondence with opposing counsel.	\$495.00	0.5	\$247.50
Apr 25, 2019	JR	Attention to strategy; legal research with client re same; correspondence with client re same.	\$495.00	2.5	\$1,237.50
Apr 26, 2019	DS	Analyze Opinion and draft Memo to client, including a summary of the Opinion and an outline of potential ways to proceed	\$485.00	1.9	\$921.50
Apr 26, 2019	DS	Review J. Rue Memo; confer internally re: strategy for handling matter; finalize client memo and send same	\$485.00	0.6	\$291.00
Apr 26, 2019	JR	Attention to status memorandum to client.	\$495.00	1.3	\$643.50
May 06, 2019	DS	Review email from client; attend to strategy for response; draft brief response to client email	\$485.00	0.9	\$436.50
May 06, 2019	DS	Phone call with D. A. REDACTED	\$485.00	1.4	\$679.00
May 06, 2019	DS	Review Answer; review motion for reconsideration; email to client	\$485.00	0.5	\$242.50
May 06, 2019	SD	Fax to Court re Objection to Request for Reconsideration.	\$165.00	0.2	\$33.00
May 09, 2019	DS	Email from adversary; draft email to client with analysis of adversary's request; exchange emails with client, court and adversary	\$485.00	0.4	\$194.00
May 17, 2019	DS	Review email from Court; draft email to client	\$485.00	0.3	\$145.50
May 20, 2019	DS	Review client email; email to adversary/court; review J. Rue email; multiple emails re: scheduling	\$485.00	0.3	\$145.50
May 20, 2019	LQ	Review correspondence with client re: settlement	\$440.00	0.1	\$44.00
May 22, 2019	DS	Analyze grade issues; prepare GPA calculations	\$485.00	1	\$485.00
May 23, 2019	DS	Further attention to analysis of grade issues; attend to scheduling issues	\$485.00	0.7	\$339.50

May 29, 2019	DS	Email re: scheduling	\$485.00	0.1	\$48.50
May 30, 2019	LQ	Attention to settlement conference confirmation re: Sept 2019 dates	\$440.00	0.1	\$44.00
May 31, 2019	DS	Draft email re: scheduling	\$485.00	0.1	\$48.50
May 31, 2019	DS	Additional emails re: scheduling	\$485.00	0.1	\$48.50
Jun 04, 2019	DS	Review email from Court; draft email to client	\$485.00	0.1	\$48.50
Jun 10, 2019	DS	Phone call from D. A. REDACTED	\$485.00	0.4	\$194.00
Jun 10, 2019	JR	Further client communications re strategy.	\$495.00	1.5	\$742.50
Jun 11, 2019	DS	Review/revise draft email to client re: options and recommendation	\$485.00	0.4	\$194.00
Jun 18, 2019	DS	Prepare for client call; conference call with client	\$485.00	1.3	\$630.50
Jun 18, 2019	JR	Further attention to case strategy and client advice; email re same.	\$495.00	2.5	\$1,237.50
Aug 30, 2019	DS	Telephone call from D. A. REDACTED	\$485.00	0.5	\$242.50
Sep 06, 2019	DS	Phone call from D. A. REDACTED	\$485.00	0.5	\$242.50
Sep 27, 2019	DS	Phone call from D. A. REDACTED	\$485.00	0.5	\$242.50
Oct 03, 2019	DS	Draft proposed settlement letter, including analysis of transcripts and identifying basis for proposed grade changes	\$485.00	1.6	\$776.00
Oct 03, 2019	DS	Draft email to client re: scheduling	\$485.00	0.2	\$97.00
Oct 04, 2019	DS	Review email traffic related to scheduling and handling; attend to strategy for future handling	\$485.00	0.4	\$194.00
Oct 07, 2019	DS	Review/respond to client email	\$485.00	0.1	\$48.50
Oct 07, 2019	DS	Attend to strategy for handling	\$485.00	0.1	\$48.50
Oct 07, 2019	DS	Email to Court and Counsel re: scheduling	\$485.00	0.1	\$48.50
Oct 07, 2019	DS	Review/respond to client email	\$485.00	0.1	\$48.50
Oct 07, 2019	LQ	Attention to settlement communication and calendar dates	\$440.00	0.1	\$44.00
Oct 16, 2019	DS	Review email from adversary; draft email to client re: same; draft brief reply to adversary	\$485.00	0.3	\$145.50

Nov 25, 2019	SD	Call from Court, E-Mail to Don.	\$165.00	0.1	\$16.50
Dec 10, 2019	DS	Review file and draft detailed follow-up email to client	\$485.00	0.4	\$194.00
Dec 10, 2019	DS	Review client's responsive email	\$485.00	0.1	\$48.50
Dec 10, 2019	JR	Review letter from D.A.	\$495.00	0.2	\$99.00
Dec 12, 2019	JR	Respond to letter from D.A.	\$495.00	0.4	\$198.00
Dec 16, 2019	SD	Review/Format/Upload Notice, Updating Case Tracking/Trial Calendar.	\$165.00	0.2	\$33.00
Dec 23, 2019	DS	Review status of file, including recent voicemail, and draft email to clients	\$485.00	0.4	\$194.00
Jan 08, 2020	DS	Draft email to client re: status conference strategy	\$485.00	0.2	\$97.00
Jan 08, 2020	DS	Prepare for status call with Court; status call with Court and adversary	\$485.00	0.3	\$145.50
Jan 08, 2020	SD	Call from Pettineo, Fwd to Don.	\$165.00	0.1	\$16.50
Jan 16, 2020	DS	Draft email to client re: authority for dismissal, including file review re: same	\$485.00	0.3	\$145.50
Jan 16, 2020	SD	Review/Format/Upload Correspondence, Filing Paper Copy.	\$165.00	0.1	\$16.50
Jan 20, 2020	DS	Draft email to client re: confirmation of authorization for dismissal and client's phone call	\$485.00	0.3	\$145.50
Jan 27, 2020	KW	Attention A <span style="background-color: black; color: black;">REDACTED</span> re litigation strategy.	\$275.00	0.5	\$137.50
Feb 17, 2020	KW	Document review re dismissal order.	\$275.00	1	\$275.00
Feb 20, 2020	KW	Attention document review re case docket.	\$275.00	1	\$275.00
Mar 10, 2020	DS	Attend to strategy for appeal	\$485.00	0.1	\$48.50
Mar 12, 2020	KW	Document review re A <span style="background-color: black; color: black;">REDACTED</span> complaint.	\$275.00	2	\$550.00
Mar 12, 2020	KW	Legal research re A <span style="background-color: black; color: black;">REDACTED</span> complaint.	\$275.00	2	\$550.00
Mar 13, 2020	KW	Legal research re A <span style="background-color: black; color: black;">REDACTED</span> complaint.	\$275.00	2	\$550.00
Mar 13, 2020	SD	Attention to Distinguishing Current Electronic Case Files.	\$165.00	0.8	\$132.00

Mar 13, 2020	KW	Draft A REDACTED complaint.	\$275.00	2	\$550.00
Mar 16, 2020	KW	Draft A REDACTED complaint.	\$275.00	4	\$1,100.00
Mar 17, 2020	DS	Review/revise draft Preliminary Statement for Complaint; emails re: same	\$485.00	1.6	\$776.00
Mar 17, 2020	SD	E-Mail from Don, Working on SharePoint Directory for Client's Files.	\$165.00	1.1	\$181.50
Mar 17, 2020	KW	Draft A REDACTED complaint.	\$275.00	3	\$825.00
Mar 17, 2020	SD	Working on SharePoint Files Directory cont.	\$165.00	0.5	\$82.50
Mar 17, 2020	KW	Attention A REDACTED file clean-up.	\$275.00	0.25	\$68.75
Mar 18, 2020	KW	Draft A REDACTED complaint.	\$275.00	3	\$825.00
Mar 20, 2020	KW	Attention to filing calendar.	\$275.00	0.5	\$137.50
Apr 08, 2020	DS	Review/revise draft Complaint	\$485.00	5.7	\$2,764.50
Apr 08, 2020	KW	Correspondence re draft complaint.	\$275.00	0.5	\$137.50
Apr 15, 2020	DS	Review draft complaint and revise same	\$485.00	0.9	\$436.50
Apr 16, 2020	DS	Update causes of action in DNJ complaint per J. Rue Comments; related research	\$485.00	2.9	\$1,406.50
Apr 20, 2020	DS	Make additional changes based on J. Rue comments and forward to client for approval	\$485.00	0.5	\$242.50
Apr 20, 2020	KW	Correspondence with clients re review of complaint.	\$275.00	0.5	\$137.50
Apr 28, 2020	DS	Finalize Complaint, including redaction and finalizing exhibits; draft CCS; forward documents for filing	\$485.00	3.2	\$1,552.00
Apr 28, 2020	SD	E-Filing Federal Appeal of Due Process Petition.	\$165.00	0.6	\$99.00
Apr 28, 2020	SD	E-Filing Federal Appeal cont.	\$165.00	0.1	\$16.50
Apr 28, 2020	SD	Review/Format/Upload Docket Entry re Federal Complaint, Fwd to John, Updating Case Tracking.	\$165.00	0.2	\$33.00

Apr 29, 2020	SD	Review/Format/Upload Entry/Notices Summons/Filings/Judge Assignment, Updating Case Tracking, Fwd to John.	Docket re	\$165.00	0.1	\$16.50
Jun 02, 2020	DS	Review draft Ack of Service; draft proposed email re: same		\$485.00	0.5	\$242.50
Jun 02, 2020	KW	Draft Acknowledgment of Service.		\$275.00	1	\$275.00
Jun 15, 2020	DS	Review Ack of Service; draft assignments related to same		\$485.00	0.2	\$97.00
Jun 15, 2020	DS	Review Rule 11 letter from adversary; preliminary analysis of same, including brief related research; draft project assignment for response to letter		\$485.00	0.6	\$291.00
Jun 15, 2020	SD	Review/Format/Upload Correspondence from Pettineo re Acknowledgment of Service of Summons and Complaint re Appeal, Fwd to Don/John/Kenneth, Filing Paper Copy.		\$165.00	0.2	\$33.00
Jun 15, 2020	KW	Attention to filing Acknowledgment of Service.		\$275.00	0.2	\$55.00
Jun 15, 2020	SD	E-Filing Acknowledgment of Service re Appeal Complaint/Summons, Updating Calendar/Case Tracking re Answer Deadline.		\$165.00	0.2	\$33.00
Jun 15, 2020	JR	Review of materials sent by Wall.		\$495.00	0.5	\$247.50
Jul 01, 2020	DS	Draft project assignment: Request for Entry of Default		\$485.00	0.2	\$97.00
Jul 01, 2020	DS	Draft response to Rule 11 letter, including related research, and circulate for internal review		\$485.00	2.2	\$1,067.00
Jul 01, 2020	DS	Review/revise draft Request for Entry of Default		\$485.00	0.6	\$291.00
Jul 01, 2020	SD	Drafting Request for Entry of Default, Sending to Don.		\$165.00	0.9	\$148.50
Jul 02, 2020	DS	Review DNJ standing Orders re: potential extension of deadlines		\$485.00	0.4	\$194.00
Jul 02, 2020	DS	Finalize/file Request for Entry of Default; finalize/serve response to Rule 11 letter		\$485.00	1.2	\$582.00

Jul 02, 2020	<i>KW</i>	Review letter to Pettineo re Rule 11.	\$275.00	0.2	\$55.00
Jul 02, 2020	<i>SD</i>	Preparing Certified Correspondence re Entry of Default/Rule 11 Sanctions to Pettineo, Leaving on Anne's Desk for Shipment.	\$165.00	0.4	\$66.00
Jul 02, 2020	<i>SD</i>	Review/Format/Upload Docket Entry re Request for Entry of Default.	\$165.00	0.1	\$16.50
Jul 02, 2020	<i>SD</i>	Review/Format/Upload Clerk's Entry of Default.	\$165.00	0.1	\$16.50
Jul 03, 2020	<i>KW</i>	Review email correspondence re informing client of the appeal of the OAL decision on grades.	\$275.00	0.1	\$27.50
Jul 03, 2020	<i>KW</i>	Correspondence with clients re appeal update.	\$275.00	0.2	\$55.00
Jul 06, 2020	<i>DS</i>	Phone call with J. Rue re: strategy for response to Motion to Vacate	\$485.00	0.2	\$97.00
Jul 06, 2020	<i>JR</i>	Attention to preliminary issues and default.	\$495.00	1.2	\$594.00
Jul 06, 2020	<i>KW</i>	Attention case strategy.	\$275.00	0.2	\$55.00
Jul 07, 2020	<i>SD</i>	Review/Format/Upload Docket Entries re Def. Motion to Vacate Default, Updating Calendar/Case Tracking.	\$165.00	0.3	\$49.50
Jul 08, 2020	<i>SD</i>	Updating Calendar/Case Tracking re Deadline to Oppose Motion Vacating Default.	\$165.00	0.2	\$33.00
Jul 08, 2020	<i>KW</i>	Attention to filing.	\$275.00	0.2	\$55.00
Jul 14, 2020	<i>DS</i>	Confer with F. Geier and K. Walk re: strategy for Motion for Default judgment	\$485.00	0.3	\$145.50
Jul 14, 2020	<i>KW</i>	Attention to litigation strategy.	\$275.00	0.35	\$96.25
Jul 15, 2020	<i>DS</i>	Video Conference with F. Geier and K. Walk re: Cross-Motion for Default Judgment; research re: rules related to service of process; draft detailed email with results of research for inclusion in brief; draft email with shell of brief to use as a model	\$485.00	2.1	\$1,018.50
Jul 15, 2020	<i>KW</i>	Correspondence re legal research.	\$275.00	0.5	\$137.50

Jul 16, 2020	<i>DS</i>	Review/revise draft of Point I of brief	\$485.00	4.7	\$2,279.50
Jul 16, 2020	<i>KW</i>	Draft Statement of Facts for Cross Motion.	\$275.00	2	\$550.00
Jul 16, 2020	<i>FG</i>	Draft Part 1 of Opposition to Motion to Vacate Default and Cross Motion for Default Judgment	\$385.00	1.5	\$577.50
Jul 16, 2020	<i>KW</i>	Attention to Cross Motion.	\$275.00	0.2	\$55.00
Jul 17, 2020	<i>DS</i>	Follow up on open projects	\$485.00	0.1	\$48.50
Jul 17, 2020	<i>DS</i>	Review/revise draft brief in support of default judgment	\$485.00	1.7	\$824.50
Jul 17, 2020	<i>KW</i>	Attention to Cross Motion.	\$275.00	0.2	\$55.00
Jul 17, 2020	<i>KW</i>	Draft Part 2 for Cross Motion.	\$275.00	4	\$1,100.00
Jul 20, 2020	<i>DS</i>	Work on cross-motion for default judgment	\$485.00	1.5	\$727.50
Jul 20, 2020	<i>DS</i>	Complete intermediate draft of brief and circulate for internal review; email to K. Walk re: information needed for Statement of Facts	\$485.00	1.2	\$582.00
Jul 20, 2020	<i>DS</i>	Work on Cross-Motion for default judgment, including incorporating J. Rue changes, updated Statement of Facts, and finalizing all motion papers	\$485.00	3.4	\$1,649.00
Jul 20, 2020	<i>KW</i>	File Cross Motion.	\$275.00	4	\$1,100.00
Jul 20, 2020	<i>KW</i>	Correspondence re filing Cross Motion.	\$275.00	1	\$275.00
Jul 20, 2020	<i>JR</i>	Attention to opposition to motion to vacate default.	\$495.00	2.9	\$1,435.50
Jul 20, 2020	<i>FG</i>	Drafted insert for Brief in opposition to motion to vacate default and Cross Motion for Default Judgment	\$385.00	0.75	\$288.75
Jul 21, 2020	<i>SD</i>	Review/Format/Upload Docket Entries re Cross Motion for Default Judgment, Fwd to John/Kenneth/Geier, Preparing Courtesy Copy for Judge Wolfson, CC to Judge Quraishi.	\$165.00	0.7	\$115.50



Jul 21, 2020	<i>SD</i>	Preparing Courtesy Copies of Cross Motion for Judges cont., CC to Pettineo (no encl.), Sending Courtesy Copies.	\$165.00	0.2	\$33.00
Jul 21, 2020	<i>SD</i>	Review/Format/Upload Docket Notice Scheduling Cross-Motion, Updating Calendar/Case Tracking.	\$165.00	0.2	\$33.00
Jul 23, 2020	<i>DS</i>	Draft email to client with briefs and recommendations	\$485.00	0.6	\$291.00
Jul 28, 2020	<i>SD</i>	Review/Format/Upload Docket Entry re Reply Brief re Motion to Vacate Default.	\$165.00	0.1	\$16.50
Jul 29, 2020	<i>DS</i>	Review/revise draft reply brief; related research	\$485.00	1.7	\$824.50
Jul 29, 2020	<i>FG</i>	Drafted sur-reply to Defendant's reply to Opposition to Motion to Vacate Default and Cross Motion for Default Judgment	\$385.00	1.5	\$577.50
Jul 30, 2020	<i>DS</i>	Work on motion for leave to file a reply	\$485.00	0.9	\$436.50
Jul 30, 2020	<i>DS</i>	Phone call with F. Geier re: Mtn for Leave to file a Reply; email re: same	\$485.00	0.2	\$97.00
Jul 30, 2020	<i>DS</i>	Work on reply brief on cross-motion for default judgment	\$485.00	0.6	\$291.00
Jul 30, 2020	<i>FG</i>	Drafted letter to Judge requesting leave to file sur-reply to Defendant's reply brief to Opposition to Motion to Vacate Default and Cross-Motion for Default Judgment	\$385.00	1	\$385.00
Sep 28, 2020	<i>DS</i>	Review Opinion & Order entered by the Court; draft email to clients re: same	\$485.00	0.3	\$145.50
Oct 05, 2020	<i>SD</i>	Review/Format/Upload Docket Entries re Answer to Complaint/Order re Scheduling Teleconference, Fwd to John, Updating Calendar/Case Tracking.	\$165.00	0.3	\$49.50
Oct 22, 2020	<i>DS</i>	Draft Proposed Joint Discovery Plan	\$485.00	1.7	\$824.50
Nov 03, 2020	<i>DS</i>	Review adversary's comments to proposed joint discovery plan; revise same and draft email to adversary re: same	\$485.00	0.4	\$194.00

Nov 03, 2020	DS	Draft status email to client, including file review	\$485.00	0.3	\$145.50
Nov 09, 2020	DS	Check in on status; draft follow-up email to client	\$485.00	0.2	\$97.00
Nov 10, 2020	DS	Draft follow-up email to client	\$485.00	0.1	\$48.50
Nov 11, 2020	DS	Follow up with adversary on comments to proposed joint discovery plan	\$485.00	0.3	\$145.50
Nov 11, 2020	DS	Finalize/file Proposed Joint Discovery Plan	\$485.00	0.4	\$194.00
Nov 12, 2020	SD	Review/Format/Upload Docket Entry re Joint Discovery Plan.	\$165.00	0.1	\$16.50
Nov 12, 2020	SD	Checking Magistrate Judge Quraishi's Judicial Preferences re Courtesy Copies, E-Mail to Don re Courtesy Copies/Judicial Preferences.	\$165.00	0.1	\$16.50
Nov 19, 2020	DS	Prepare for Rule 16 Conference, including review of proposed stipulated facts and out line for discussion; participate in Rule 16 Conference	\$485.00	1	\$485.00
Nov 19, 2020	DS	Draft update email to client	\$485.00	0.3	\$145.50
Nov 19, 2020	SD	Review/Format/Upload Docket Notices re Minute Entry/Text Order, Updating Calendar/Case Tracking.	\$165.00	0.1	\$16.50
Nov 23, 2020	DS	Draft email to client re: first part of settlement proposal	\$485.00	0.4	\$194.00
Dec 09, 2020	SD	Call to Client re Schedule Phone Conference w Don.	\$165.00	0.1	\$16.50
Dec 10, 2020	SD	E-Mail from Don re Client Call, Follow-up Call to Client re Schedule Call w Don, E-Mail to Don re Client Call/E-Mail.	\$165.00	0.2	\$33.00
Dec 21, 2020	DS	Emails to/from client	\$485.00	0.2	\$97.00
Dec 28, 2020	DS	Analyze new transcript and add to chart; create chart of potential grade changes and draft email to client re: same	\$485.00	1.1	\$533.50
Dec 30, 2020	DS	Review/revise draft email to client	\$485.00	0.2	\$97.00

Dec 30, 2020	SD	Review/Format/Upload Docket Entry re Letter re Dismissal/Text Order re Status Teleconference, Fwd to John, Updating Calendar/Case Tracking.	\$165.00	0.2	\$33.00
Jan 06, 2021	DS	Phone call from client	\$485.00	0.1	\$48.50
Jan 06, 2021	DS	Review information provided by client; work on settlement letter	\$485.00	3	\$1,455.00
Jan 08, 2021	DS	Work on settlement position letter	\$485.00	0.4	\$194.00
Jan 08, 2021	DS	Phone call with client re: settlement position; final preparation for court conference; court conference	\$485.00	1.5	\$727.50
Jan 08, 2021	DS	Review client comments on letter; finalize and serve same; draft email to client	\$485.00	1	\$485.00
Jan 08, 2021	DS	Review docket entries; draft letter to Magistrate; attention to filing same	\$485.00	0.5	\$242.50
Jan 11, 2021	DS	Phone call with D. Augustyn to discuss GPA and other issues with 2019 transcript; follow-up email re: same	\$485.00	1.2	\$582.00
Jan 11, 2021	SD	Review/Format/Upload Docket Notices/Entries re Minute Entry/Test Order/Soutar Letter, Call to Don re Text Order Deadline.	\$165.00	0.1	\$16.50
Jan 25, 2021	DS	Exchange emails with adversary re: prospects for settlement	\$485.00	0.1	\$48.50
Jan 26, 2021	DS	Draft status email to client	\$485.00	0.2	\$97.00
Jan 26, 2021	DS	Exchange emails with client re: settlement	\$485.00	0.1	\$48.50
Jan 28, 2021	DS	Prepare for and participate in status call with Court; draft email to client, summarizing status call and recommending settlement counter-offer	\$485.00	0.8	\$388.00
Jan 29, 2021	DS	Attend to GPA calculations and settlement analysis	\$485.00	0.7	\$339.50
Feb 25, 2021	SD	E-Mail to Don re GPA Analysis Assignment.	\$165.00	0.1	\$16.50
Mar 08, 2021	DS	Draft email to client, following up on request for settlement proposal; draft email to adversary	\$485.00	0.5	\$242.50

Mar 17, 2021	DS	Review/respond to client email, including finalizing chart of settlement proposal	\$485.00	0.4	\$194.00
Mar 18, 2021	SD	Review/Format/Upload Docket Notice/Text Order re Minute Entry/Cross Motions, Updating Calendar/Case Tracking.	\$165.00	0.1	\$16.50
Mar 26, 2021	DS	Draft follow-up email to client re: settlement counter-proposal	\$485.00	0.1	\$48.50
Apr 08, 2021	DS	Draft Motion for Summary Judgement; work on stipulated facts	\$485.00	2.5	\$1,212.50
Apr 08, 2021	DS	Finalize Stipulation of Facts and draft email transmitting same	\$485.00	0.3	\$145.50
Apr 08, 2021	DS	Review/revise draft brief and SOMF; draft assignments for paralegal	\$485.00	5	\$2,425.00
Apr 09, 2021	DS	Complete intermediate draft of brief and circulate for internal review	\$485.00	0.3	\$145.50
Apr 09, 2021	DS	Review/revise/finalize draft motion papers and file same	\$485.00	3.5	\$1,697.50
Apr 09, 2021	SD	Review/Format/Upload Docket Entry re Stipulation of Facts, Fwd to John.	\$165.00	0.1	\$16.50
Apr 09, 2021	SD	Attention to Don's E-Mail re Motion for Summary Judgment, Drafting Notice of Motion/Soutar Certification/Proposed Order, Working on Citations in Statement of Undisputed Facts.	\$165.00	1	\$165.00
Apr 09, 2021	SD	Working on Statement of Undisputed Facts cont., Working on Brief Citations/Table of Authorities, E-Mail to Don, Call from John re Brief.	\$165.00	0.7	\$115.50
Apr 09, 2021	JR	Researching, drafting, and refining SJ brief.	\$495.00	4.4	\$2,178.00
Apr 12, 2021	SD	Review/Format/Upload Docket Entries/Notice re Motions for Summary Judgment, Updating Calendar/Case Tracking, Fwd to John.	\$165.00	0.3	\$49.50
Apr 16, 2021	DS	Internal communications re: strategy and handling	\$485.00	0.1	\$48.50

Apr 16, 2021	JR	Legal research and drafting opposition to MSJ.	\$495.00	4.4	\$2,178.00
Apr 18, 2021	JR	Further attention to research and drafting opposition to MSJ.	\$495.00	2.9	\$1,435.50
Apr 19, 2021	DS	Review/revise brief; finalize same and finalize certification of service; file same	\$485.00	1.9	\$921.50
Apr 19, 2021	JR	Finalizing brief in opp to MSJ.	\$495.00	1.5	\$742.50
Apr 20, 2021	SD	Review/Format/Upload Docket Entries re Briefs in Opposition to Summary Judgments, Fwd to John.	\$165.00	0.1	\$16.50
Apr 20, 2021	SD	Drafting Notice of Appearance for John, Sending to Don.	\$165.00	0.3	\$49.50
Apr 25, 2021	DS	Draft Reply Brief	\$485.00	1.5	\$727.50
Apr 26, 2021	DS	Work on draft Reply Brief; draft Reply Certification; Draft Certification of Service (--/3.9)	\$485.00	3.9	\$1,891.50
Apr 26, 2021	DS	Incorporate J. Rue comments to brief; finalize and file same	\$485.00	0.8	\$388.00
Apr 26, 2021	JR	Review and revise reply brief.	\$495.00	1.5	\$742.50
Apr 27, 2021	SD	Review/Format/Upload Docket Entry re Motion for Summary Judgement Reply Briefs, Fwd to John, E-Mail to John/Don re Sealed Documents.	\$165.00	0.1	\$16.50
Apr 28, 2021	SD	Review/Format/Upload Defendant Reply Brief re Motion for Summary Judgment, Fwd to John.	\$165.00	0.1	\$16.50
Jun 29, 2021	SD	Review/Format/Upload Docket Notice re Judge Reassignment, Updating Case Tracking.	\$165.00	0.1	\$16.50
Nov 19, 2021	JR	Attention to DNJ decision; strategy and planning.	\$495.00	2.5	\$1,237.50
Nov 19, 2021	JR	Preliminary attention to transition issues.	\$495.00	1.1	\$544.50
Nov 22, 2021	DS	Review Opinion & Order from DNJ; internal phone calls and emails re: same	\$485.00	1.4	\$679.00
Nov 24, 2021	SD	Review/Format/Upload Docket Notice re Case Terminated, Updating Case Tracking/Calendar re Fee Application/Case Status.	\$165.00	0.1	\$16.50

Nov 29, 2021	DS	Draft summary for client	\$485.00	0.7	\$339.50
Nov 30, 2021	JR	Attention to fee demand.	\$495.00	0.5	\$247.50
Nov 30, 2021	DS	Complete draft email to client; meeting to discuss open issues and strategy for moving forward	\$485.00	0.9	\$436.50
Dec 01, 2021	SD	Review/Format/Upload Docket Entry re Thurston Notice of Appearance, Fwd to John.	\$165.00	0.1	\$16.50
Dec 10, 2021	JR	Attention to fee demand; correspondence with adversary.	\$495.00	1.2	\$594.00
Dec 10, 2021	JR	Attention to scheduling.	\$495.00	0.5	\$247.50
Dec 13, 2021	SD	Review/Format/Upload Docket Entries re Fee Application Deadlines, Fwd to John, Updating Calendar/Case Tracking.	\$165.00	0.2	\$33.00
Dec 16, 2021	JR	Email with adversary re settlement of fees.	\$495.00	0.3	\$148.50
Jan 10, 2022	JR	Attention to fee application materials.	\$495.00	1.1	\$544.50
Jan 12, 2022	CW	JRA filings; Letter tolling fee petition; fee petition proposed order; Order Granted	\$75.00	0.4	\$30.00
Jan 13, 2022	CW	JRA filings; Order Granted	\$75.00	0.2	\$15.00
Jan 13, 2022	JR	Attention to supporting certifications.	\$495.00	0.7	\$346.50
***** <b>Expenses</b> *****					
Apr 28, 2020		PACER; Filing Fee re Complaint Appealing OAL Decision.	\$400.00	Expense	\$400.00
Jul 06, 2020		Certified mail payment.	\$7.10	Expense	\$7.10
Jul 21, 2020		Neopost; Postage re CCs of Cross-Motion to Judges Wolfson and Quraishi.	2@\$2.20	Expense	\$4.40
Jul 21, 2020		Neopost; CC of Cross Motion Courtesy Copy Cover Letter to Pettineo.	\$0.50	Expense	\$0.50

Total Fees	\$151,278.75
Total Expenses	\$412.00
Subtotal	\$151,690.75
Past Due Balance	\$0.00
<b>Total</b>	<b>\$151,690.75</b>

**Please pay : \$151,690.75**

Timekeeper Summary

<b>Timekeeper</b>	<b>Hours</b>	<b>Fee Billed</b>
SD - Sean Dalrymple [Paralegal]	40.40 h	\$6,666.00
FG - Frank Geier [Associate]	4.75 h	\$1,828.75
LA - Latiah Griffin [Law Clerk]	7.70 h	\$1,694.00
LQ - Lisa Quartarolo [Of Counsel]	51.70 h	\$22,748.00
JR - John Rue [Partner]	50.00 h	\$24,750.00
DS - Donald Soutar [Partner]	175.70 h	\$83,482.00
KW - Kenneth Walk [Associate]	36.60 h	\$10,065.00
CW - Claire Walsh [Legal Assistant]	0.60 h	\$45.00
<b>Total</b>	<b>367.45 h</b>	<b>\$151,278.75</b>

Payments (As of 02/11/2022)

<b>Date</b>	<b>Invoice#</b>	<b>Amount</b>
<b>Total</b>		<b>\$0.00</b>

Total billed including this Invoice \$151690.75 (Fees: \$151278.75, Expenses: \$412.00, Discounts:\$0.00)

***This invoice is a "pro forma," provided for your information only. No payment is due at this time.***